

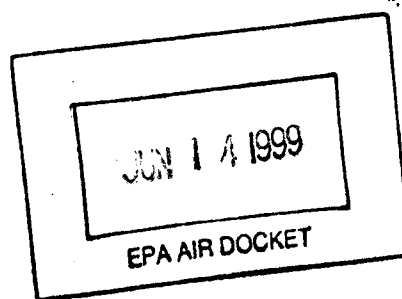


AMERICAN FOREST & PAPER ASSOCIATION
Regulatory Affairs

A-99-15
IV-A-01

June 14, 1999

U.S. Environmental Protection Agency
EPA Air Docket
Attn: Docket A-99-15
Waterside Mall
Room M1500
401 M Street, S.W.
Washington, DC 20460



Re: Comments of the American Forest & Paper Association
Regarding the Proposed Amendments to the Accidental Release
Prevention Requirements: Risk Management Programs Under Clean Air
Act Section 112(r)(7); Amendments to the Worst-Case Release Scenario
Analysis for Flammable Substances

Dear Sir or Madam:

The American Forest & Paper Association ("AF&PA") submits the following comments on the U.S. Environmental Protection Agency's ("EPA" or the "Agency") proposed amendments to the Risk Management Program rule mandated by the accidental release prevention provisions of the Clean Air Act Amendments of 1990. The proposal was published in the *Federal Register* on May 26, 1999 (64 *Fed. Reg.* 28,702).

AF&PA is the national trade association of the forest, pulp, paper, paperboard and wood products industry. Our organization represents over 250 member companies and related trade associations engaged in the growing, harvesting, and processing of wood and wood fiber, and the manufacture of pulp, paper, and paperboard products from both virgin and recycled fiber, as well as solid wood products. Additionally, AF&PA represents a vital national industry which accounts for over eight percent of the total U.S. manufacturing output.

AF&PA has a significant interest in EPA's proposed revisions to the Risk Management Program (RMP) rule because many of its members will be required to prepare and submit risk management plans to comply with the accidental release prevention provisions of the Clean Air Act.

For several reasons, AF&PA supports the proposed amendments to make worst-case release scenario analysis provisions for flammable substances consistent with those for toxic substances. First, AF&PA believes that it makes sense from a technical perspective to ensure consistency in the way in which liquids are modeled under the RMP rule, regardless of whether they are listed flammables or toxics. The same principles for volatilization would apply. AF&PA agrees that the current requirement to treat all worst-case release scenarios for flammable substances as if the entire quantity in a vessel or

process line is involved in a vapor cloud explosion will simply generate overly conservative modeling results that are technically inaccurate.

Second, AF&PA believes that the proposed changes would help to ensure that risk management plans provide more useful and reasonable information to potential users (e.g., local emergency responders and the local public) than would be expected under the current provisions. EPA has already taken an extremely conservative approach in the final RMP rule by requiring facilities to develop worst-case release scenarios. It is critical, therefore, that the Agency take this opportunity to ensure that the information provided in risk management plans is as realistic and useful as possible. To that end, EPA should remove any erroneous assumptions or requirements from the RMP rule that will only lead to the development of overly conservative information.

AF&PA appreciates the opportunity to offer these comments. Please contact me with any questions regarding the above comments.

Very truly yours,


Susan S. Crowley
Manager, Environmental Affairs

cc: John L. Festa, Ph.D.